

1 Vanessa R. Waldref  
2 United States Attorney  
3 Eastern District of Washington  
4 Frances E. Walker  
5 Assistant United States Attorney  
6 402 E. Yakima Ave., Ste. 210  
7 Yakima, WA 98901  
8 Telephone: (509) 454-4425

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 [REDACTED] and  
15 LAURO OMAR JUAREZ,

16 Defendants.  
17

Case No.: 1:22-CR-2081-SAB

SUPERSEDING INDICTMENT

Vio.: 21 U.S.C. § 841(a)(1),  
(b)(1)(B)(vi)  
Distribution of 40 Grams or  
More of a Mixture or  
Substance Containing  
Fentanyl  
(Counts 1 and 2)

21 U.S.C. § 841(a)(1), (b)(1)(C)  
Distribution of a Mixture or  
Substance Containing Fentanyl  
(Count 3)

21 U.S.C. § 841(a)(1),  
(b)(1)(B)(vi)  
Possession with Intent to  
Distribute 40 Grams or More o  
a Mixture or Substance  
Containing Fentanyl (Count 4)

21 U.S.C. § 853  
Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3  
4 On or about May 6, 2022, in the Eastern District of Washington, the  
5 Defendant, [REDACTED], did knowingly distribute 40 grams or  
6  
7 more of a mixture or substance containing N-phenyl-N-[1-(2-phenylethyl)-4-  
8 piperidiny] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in  
9  
10 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

11 COUNT 2

12 On or about May 25, 2022, in the Eastern District of Washington, the  
13  
14 Defendants, [REDACTED] and LAURO OMAR JUAREZ, did  
15  
16 knowingly distribute 40 grams or more of a mixture or substance containing N-  
17  
18 phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (a/k/a fentanyl), a  
19  
20 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),  
(b)(1)(B)(vi).

21 COUNT 3

22 On or about July 7, 2022, in the Eastern District of Washington, the  
23  
24 Defendants, [REDACTED] and LAURO OMAR JUAREZ, did  
25  
26 knowingly distribute a mixture or substance containing N-phenyl-N-[1-(2-  
27  
28 phenylethyl)-4-piperidiny] propanamide (a/k/a fentanyl), a Schedule II controlled  
substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 4

On or about August 24, 2022, in the Eastern District of Washington, the Defendant, [REDACTED], did knowingly possess with intent to distribute 40 grams or more of a mixture or substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841, as set forth in this Superseding Indictment, the Defendants, [REDACTED] and LAURO OMAR JUAREZ, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense. The property to be forfeited includes, but is not limited to:

COUNT 4:

- \$92,613 in U.S. Currency;
- Glock brand 9mm pistol (Tan), Model: 19X, Serial Number: BWZU875;

- 1 – TNW Inc. brand multi-caliber rifle, Model: ASR, Serial Number: M5067;
- 2 – Glock Inc. brand 9mm pistol, Model: Glock 26 Gen5, Serial Number:
- 3 AGBP868;
- 4 – Radical Firearms, LLC brand 5.56 caliber rifle, Model: RF-15, Serial
- 5 Number: RD06215;
- 6 – Smith and Wesson brand 5.56 caliber rifle, Model: M&P-15, Serial Number:
- 7 TV58417;
- 8 – Glock GMBH brand 9mm pistol (gold/black), Model: 19, Serial Number:
- 9 BRBS190;
- 10 – Romarm/Cugir brand 7.62 caliber pistol, Model: Draco, Serial Number: DF-
- 11 5580-20;
- 12 – Palmetto State Armory brand multicaliber rifle, Model: PA-15, Serial
- 13 Number: PIO38125;
- 14 – Taurus International brand .22 caliber pistol, Model: PT-22, Serial Number:
- 15 Y111431;
- 16 – Bond Arms brand .45 caliber pistol, Model: Snake Slayer, Serial Number:
- 17 55680; and a,
- 18 – Rogue Rifle Company brand .22 caliber rifle, Model: Chipmunk, Serial
- 19 Number: 4459
- 20 If any forfeitable property, as a result of any act or omission of the Defendants:
- 21
- 22 a. cannot be located upon the exercise of due diligence;
- 23 b. has been transferred or sold to, or deposited with, a third party;
- 24 c. has been placed beyond the jurisdiction of the court;
- 25 d. has been substantially diminished in value; or
- 26
- 27
- 28

1 e. has been commingled with other property which cannot be divided  
2 without difficulty,  
3  
4 the United States of America shall be entitled to forfeiture of substitute property  
5 pursuant to 21 U.S.C. § 853(p).

6 DATED this \_\_\_\_ day of January, 2023.

7  
8 A TRUE BILL

9  
10  
11 \_\_\_\_\_  
12 Foreperson

13  
14 \_\_\_\_\_  
15 Vanessa R. Waldref  
16 United States Attorney

17  
18 \_\_\_\_\_  
19 Frances E. Walker  
20 Assistant United States Attorney  
21  
22  
23  
24  
25  
26  
27  
28